

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Shekeira Williams, et al.,

Plaintiffs,

v.

Luis S. Spencer, et al.,

Defendants.

Civil Action No. 13-10083-FDS P 314

PLAINTIFFS' FIRST SET OF INTERROGATORIES

Now comes the Plaintiffs, Donald Williams and Shekeira Williams, submits their first set of interrogatories to be answered by Nestor Cruz, Lieutenant of Inner Perimeter Security ("IPS"), pursuant to Fed. R. Civ. P. 30(a)-(c), under the pains and penalties of perjury. The defendant has 30 days to answer the following interrogatories.

1. State your name, age, educational background, and employment history?
2. State your present occupation, your job title, and job function?
3. Are you aware of an incident that took place in the SMU area of SBCC where drugs were found in the non-contact visiting area where outside visitors sit?
4. Please state your understanding of what happened that day of June 3rd, 2012 in the SMU area where the drugs were found?

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5. Is there any video of the visiting area where the drugs were found?

6. How did Shekeira Williams become a part of the investigation?

7. Has Shekeira Williams ever been a problem coming to any facility to visit with her now husband, Donald Williams?

8. Were there other women/visitors suspected of placing the drugs in the area, or was Mrs. Williams the only suspect?

9. What was your reasoning in having her barred from entering the facility for a year?


10. What evidence do you possess that suggest that Mrs. Williams is the person who placed the drugs in that area?

11. Were there other visitors barred for the same reason?

12. If no one else was barred, please state why?

All answers to these interrogatories must be provided under the pains and penalties of perjury.

Respectfully Submitted,

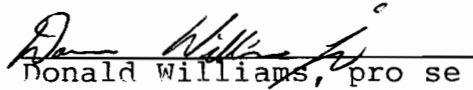

Donald Williams, pro se
SBCC
P.O. Box 8000
Shirley, Ma. 01464

Dated:

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CERTIFICATE OF SERVICE

I, Donald Williams, certify that I caused a copy of my "First Set of Interrogatories" for Nestor Cruz, to be served on his attorney of record, C. Raye Poole, Esq., Department of Correction, Legal Division, 70 Franklin Street, Suite 600, Boston, Ma. 02110-1327, by first class mail, postage prepaid.


Donald Williams, pro se

Dated:

5. Was you required to search the non-contact visiting area of the SMU upon visitors arrival and their departure?

6. If your answer is yes to ¶ 5, please state what areas were searched by you and if the searches were logged in by you?

7. Did you find any drugs in the non-contact visiting booth?

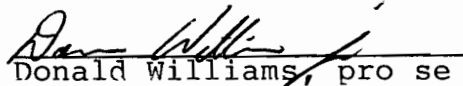
8. If your answer to ¶ 7 is yes, please state, if you know, who sat in that particular booth area?

9. During your shift, how many visits were conducted in the SMU that day?

10. When Shekeira Williams visited on June 3rd, 2012, were there other visitors with her, or was she by herself?

All answers to these interrogatories must be provided under the pains and penalties of perjury.

Respectfully Submitted,


Donald Williams, pro se
SBCC
P.O. Box 8000
Shirley, Ma. 01464

Dated:

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Plaintiffs,

Civil Action
No. 13-10083-FDS

v.

Luis S. Spencer, et al.,

Defendants.

PLAINTIFFS' FIRST SET OF INTERROGATORIES

Now comes the Plaintiffs, Shekeira Williams and Donald Williams, submits their first set of interrogatories to be answered by Brian McDonald, Director of Security, pursuant to Fed. R. Civ. P. 30(a)-(c), under the pains and penalties of perjury. The defendant has 30 days to answer the following interrogatories.

1. State your name, age, educational background, and employment history?

2. State your present occupation, your job title, and job function (without providing any security details)?

3. Are you aware of an incident that took place on June 3rd, 2012 at Souza Baranowski Correctional Center where drugs were found in the non-contact visiting area of the SMU?

4. If your answer to ¶ 3 is yes, please state what you know?

5. Can you please tell me how many visitors visited on the side of the SMU where Donald Williams was placed. Please state the total for the entire day of June 3rd, 2012?

6. Based on the information you received for that day, how many visitors were in the visiting area with Shekeira Williams visiting prisoners?

7. What visiting booth were the drugs found in?

8. What visiting booth did Mrs. Williams sit in?

9. What was your reasoning in barring Shekeira Williams for a year?

10. Can the drugs found be tied to her in any way?

11. Were any of the other visitors barred because of this? If no, why not?

12. Does the visiting area in the SMU where this incident took place have any video cameras to surveil the area?

13. Is there any video that shows Mrs. Williams in the visiting area?

14. If your answer to ¶ 13 is yes, does it show her placing any drugs in the booth area where the drugs were found?

All answers to these interrogatories must be provided under the pains and penalties of perjury.

Respectfully Submitted,


Donald Williams, pro se

SBCC

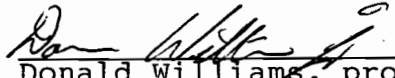
P.O. Box 8000

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Donald Williams, pro se

Dated:

11-29-2013